

October 20, 2011



Commissioner Robert McDowell
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Commissioner McDowell:

The Wyoming Telecommunications Association would like to take this opportunity to express our gratitude for your visit with us in Jackson, WY on September 28. We appreciated the opportunity to discuss the challenges of providing broadband service in the least populous (and the second most sparsely populated) state in the nation. We also appreciated the opportunity to share our vision on USF/ICC reform and the need for a transition to a modern broadband funding mechanism. As stated in the meeting, we urge the FCC to adopt as a model for reform, the Consensus Framework filed by the rural associations and six price cap carriers on July 29.

It has since come to our attention that the draft order being circulated within the FCC by Chairman Genachowski does not preserve the Consensus Framework as a basis for reform. Although we wanted true reform to put USF on a more sustainable and predictable broadband-focused path, we are hearing that the draft order addresses short-term "fixes" and does not preserve the delicate balance that the rate of return companies and price cap companies carefully negotiated in the Consensus Framework. Our main concerns with the short-term approach is that it may not allow for a reasonable recovery of costs incurred under current rules and it would neither provide the regulatory certainty that the market needs nor an adequate transition to a broadband-focused support mechanism.

As you know, there is simply not a business case to provide broadband in many parts of Wyoming absent adequate support mechanisms. We are concerned that by inappropriately limiting cost recovery and failing to set up an adequate broadband transition mechanism, many areas of Wyoming would be left behind in broadband service availability by putting future investment at risk. Therefore, we respectfully request you to vote "yes" on any order based on the proposals contained in the Consensus Framework and vote "no" on any order that would fail to provide a path to long-term reform that provides the certainty needed to promote effective investment in rural broadband.

Please let me know if you have any follow-up questions or concerns. We look forward to your next visit to the great state of Wyoming.

Sincerely,

A blue ink signature of Michael J. Kenney, written in a cursive style.

Michael J. Kenney
General Manager, Dubois Telephone Exchange, Inc.
Past-President, Wyoming Telecommunications Association

cc: Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Mignon L. Clyburn